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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

           Plaintiff,

      vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

          Defendants.

CASE NO. 3:17-cv-00939

**DECLARATION OF MICHAEL
JANOSKO**

**UNREDACTED VERSION OF
DOCUMENT FILED UNDER SEAL**

1   I, Michael Janosko, hereby declare as follows.

2   1.   I have been employed by Google Inc. ("Google") since February 29, 2016. I

3   currently hold the position of Security Engineering Manager. I make this declaration in support of

4   Waymo's Motion for a Preliminary Injunction and have personal knowledge of the facts stated

5   herein.

6   2.   I received a Bachelor's degree in Computer Engineering and a Masters degree in

7   Computer Engineering (with a focus on Information Assurance) from Syracuse University.

8   3.   In my role as Security Engineering Manager, I am responsible for managing

9   Google's Client Platform Hardening team and Access Control Infrastructure team.

10   4.   Prior to December 2016, Google's self-driving car project was known as

11   Chauffeur. For purposes of this declaration, Waymo and Google's Chauffeur project are referred

12   to collectively as "Waymo."

13   5.   Waymo generally uses Google corporate infrastructure for most network

14   connectivity, authentication, user management, data storage, and user-facing devices.

15   6.   Google addresses security in a multi-layered approach to mitigate attacks across the

16   technology stack and to practice defense in depth. The following provides an overview of Google

17   security capabilities to protect on the client platforms, insider risk mitigation, network security,

18   production environment, monitoring, detection and response.

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Physical Facilities

22.   Waymo employs reasonable efforts to secure its physical facilities by restricting access and employing locks, cameras, guards, and other security measures. Further, unlike other physical facilities on Google's Mountain View campus, Google employees not working on Waymo (or other Google X) projects are restricted from entering Waymo's Mountain View physical facility. Guests to Waymo's Mountain View physical facility are only allowed in certain areas.

SVN Repository

23.   Waymo uses Subversion (SVN) – a revision control system – to store its electrical design information. In particular, Waymo uses the Apache SVN server hosted out of ███ ████████ to store all revisions of electronic design files. Those files represent complete designs – electrical schematics, printed circuit board (PCB) layouts, mechanical drawings, design rules, and component libraries. This server holds detailed technical information related to Waymo's LiDAR systems.

24.   As of December 11, 2015, Waymo's SVN repository contained 9.7 GBs of confidential and proprietary internal Waymo information. 2 GBs of that data related to Waymo's LiDAR technology.

25.   While the SVN repository is not part of the network systems described above, Waymo takes a number of steps to protect files within its SVN repository. All traffic (both ingress to and egress from) the SVN repository is encrypted. All traffic is authenticated against a list of authorized users before access to the repository is granted, and users do not share credentials - all accesses are unique to specific users. Access control lists are audited monthly and stale users are aggressively purged. The SVN server is password protected and accessible through specialized software (e.g., TortoiseSVN).   At present, approximately ██ employees and contractors working on projects for Waymo have security permissions to access the SVN server.

I declare under penalty of perjury that the foregoing is true and correct. Executed in San Francisco, California, on March 9, 2017.

DATED: March 9, 2017

_____

Michael Janosko

-6-   Case No. 3:17-cv-00939

DECLARATION OF MICHAEL JANOSKO